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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF APPEARANCE AND
DEMAND FOR SERVICE OF DOCUMENTS**

PLEASE TAKE NOTICE that the undersigned appears in the above-captioned case on behalf of Jeffrey A. Berman, Russell deLucia, Ellenjoy Fields, Michael C. Lesser, Norman E.

Lesser Rev. 11/97 Rev. Trust, Paula E. Lesser 11/97 Rev. Trust and Jane L. O'Connor as Trustee of the Jane O'Connor Living Trust, creditors and parties-in-interest, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, and section 1109(b) of the Bankruptcy Code and demands that all notices given or required to be given and all papers served in this case be delivered to and served upon the party identified below at the following address:

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints, or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in this case.

This Notice of Appearance and any subsequent appearance, pleading, claim or suit is not intended nor shall be deemed to waive Creditors': (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to a trial by jury in any proceedings so triable herein or in any case, controversy, or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; and (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Creditors are or may be entitled under agreements, in law, or in equity, all

of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: Boston, Massachusetts
November 13, 2009

GOODWIN PROCTER LLP

By: /s/ Daniel M. Glosband

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